

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	Magistrate No. 23- 696
v.)	
)	
JOHN DOE, aka Giovanni Mancini)	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Bryton J. Peternel, being duly sworn, state as follows:

1. I am a Special Agent with United States Secret. I have been so employed as a Special Agent since July 2021. I am currently assigned to the Pittsburgh Field Office and am trained and authorized to investigate offenses such as are alleged herein. I have received training at the Federal Law Enforcement Training Center and the James J. Rowley Training Center in the investigation of financial crimes. As a federal agent, I am authorized to investigate violations of the laws of the United States and am a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

2. Prior to my employment as a Special Agent with the U.S. Secret Service, I was employed as a Uniformed Division Officer within the agency from 2017 to 2021. While with the United States Secret Service Uniformed Division, I received training in police patrolling, and affected numerous probable cause arrests in Washington, District of Columbia.

3. I am submitting this affidavit in support of a Criminal Complaint charging JOHN DOE, aka Giovanni Mancini, with Bank Fraud, in violation of 18 U.S.C. § 1344(1) and Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A(a)(1).

4. The information contained herein is based upon my own personal investigation, observations, and knowledge, as well as upon the investigation, personal observations, and knowledge of other law enforcement officers with whom I have discussed this case and with

representatives of Dollar Bank, which is a federally insured financial institution. Because this Affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included every item of evidence or piece of information known to me; rather, I have included only those facts necessary to establish probable cause.

**PROBABLE CAUSE
BACKGROUND INFORMATION**

5. Based on discussions with representatives of Dollar Bank, Dollar Bank was victimized by an automated teller machine (“ATM”) skimming fraud scheme involving approximately 700 Dollar Bank customer and more than \$450,000 in loss that occurred from on or about March 30, 2023 to on or about May 5, 2023 in the Western District of Pennsylvania and elsewhere. I have worked closely with Dollar Bank fraud investigators in this matter.

6. The scheme began with installation of skimming devices and cameras on Dollar Bank ATMs, which occurred on approximately March 30, 2023. These skimming devices were hidden within the ATMs and, without the knowledge of the customer, the devices captured and store the data from the magnetic strip on the ATM cards. That data is referred to as track data. The cameras captured the personal identification number (PIN) of the customer when the customer enters that number into the ATM.

7. At a later point, participants in the scheme retrieved the skimming devices and the cameras from the ATMs, retrieved the track data from the skimming devices and the corresponding PINs from the cameras, and then transferred the track data onto the magnetic strips of other cards. Participants in the scheme then used the fraudulently made cards and withdrew funds using the corresponding PINs from Dollar Bank ATMs and from ATMs of other federally insured financial institutions without the authorization of the customers or the federally insured financial institutions.

8. Dollar Bank provided Your Affiant, video surveillance and camera still shots from their ATMs of Suspect #1, and others, inserting the skimmers into the ATMs as well as placing a fabricated side panel which contained a camera pointing towards the ATM PIN pad to capture the customer PINs being entered. This panel is grey in color and accurately resembles the original siding of Dollar Bank's ATMs, therefore customers could not discern the difference or notice any tampering of the ATM.

9. Dollar Bank also provided video surveillance of the same suspects returning to the ATM locations to remove the skimmer and the side panel. Additionally, Dollar Bank surveillance video shows Suspect #1, and others, returning to ATM locations to utilize the fraudulently obtained customer card and PIN data to withdrawal funds from the customer accounts without their authorization. Dollar Bank provided Your Affiant with a suspect lineup, listing the suspects from #1 through #5.

10. On May 5, 2023, Dollar Bank contacted Your Affiant at 11:00AM stating that live video surveillance was conducted, and they witnessed Suspect #1 placing a skimmer and fabricated side panel into and onto an ATM at a Dollar Bank in Parma, Ohio at 6:36AM on this same date. Furthermore, Your Affiant also received notification from Dollar Bank that there were more skimmers inserted into ATMs by Suspect #1 in the Cleveland, Ohio area, to include Independence and Brecksville, Ohio. The Brecksville, Ohio ATM skimmer was placed around 8:00AM by Suspect #1. The United States Secret Service Pittsburgh Field Office immediately made notifications to the United States Secret Service Cleveland Field Office, and surveillance was set up by Cleveland Field Office Special Agents.

11. On May 5, 2023, at approximately 3:30PM, I received notification that Cleveland Field Office Special Agents and Brecksville, Ohio Police Department apprehended Suspect #1 at

the Dollar Bank in Brecksville, Ohio. Suspect #1 was seen returning to an ATM that had a skimmer and side panel previously placed on it by Suspect #1.

12. Upon his arrest, Suspect #1 provided an identification document, more specifically, an Italian Passbook identification with the name of Giovanni Mancini imprinted on it, along with the Suspect #1's photograph. Based on my review of the identification document and my training and experience, I believe that the identification document is not legitimate.

13. In addition to the identification document, Suspect #1 had on his person a Hyundai vehicle key fob. Agents located the vehicle corresponding to the key fob in the vicinity of where Suspect #1 was arrested. The vehicle registration revealed that the vehicle was owned by an individual residing in nearby Kent, OH. The owner was contacted via telephone and advised that he/she rented the vehicle using the Turo car rental service. The owner provided Special Agents from the Cleveland Field Office with consent to search the vehicle.

14. A search of the vehicle revealed numerous items of distinctive clothing that appear to be similar to those items worn by Suspect #1 in the numerous video surveillance photographs provided by Dollar Bank. Those items include a long, back winter-style jacket, red eyeglasses, and a black baseball hat with a distinct logo. In addition, an ATM skimmer device, USB thumb drives, and gift cards were found within the vehicle.

15. Following his arrest, your affiant received current photos of Suspect #1 from Cleveland Field Office Special Agents. Your affiant compared these photos provided by the Cleveland Field Office with all other photos of him provided by Dollar Bank, and it appears that the individual arrested is Suspect #1. As the true identify of the Suspect #1 remains unknown I am requesting an arrest warrant for JOHN DOE, aka aka Giovanni Mancini. Suspect #1 remains in custody in a local police station in Ohio.

16. USSS Cleveland Field Office Special Agents interviewed Suspect #1, with the assistance of an Italian translator. The Italian translator indicated to USSS Cleveland Field Office Special Agents that Suspect #1 was not a native Italian speaker and suggested that Suspect #1 was likely from Romanian. Based on my training and experience, I know that many of the groups involved in large-scale skimming scheme are from Romania.

17. During the interview, Suspect #1 generally denied involvement in the scheme, but also provided information inconsistent with information known to the USSS Cleveland Field Office Special Agents. Specifically, Suspect #1 denied approaching the ATM in question, which the USSS Cleveland Field Office Special Agents knew was not true because they had observed him approach the ATM. Suspect #1 also provided other information that the USSS Cleveland Field Office Special Agents believed was not credible about why he was in Cleveland, where he was staying in Cleveland, how he intended to get back to where he was staying, and various other information.

CONCLUSION

18. Based on all of the above, I have probable cause to believe that, from on or about March 30, 2023 to on or about May 5, 2023, JOHN DOE, aka Giovanni Mancini, violated 18 U.S.C. § 1344(1) (Bank Fraud) and 18 U.S.C. § 1028A(a)(1) (Aggravated Identity Theft).

s/ Bryton J. Peternel
Bryton J. Peternel
Special Agent, USSS

The Affiant attested to this Affidavit
by telephone pursuant to FRCP 4.1(b)(2)(A)
this 6th day of May, 2023.



HONORABLE PATRICIA L. DODGE
United States Magistrate Judge